



Comments on *Compliance Offsets Protocol Task Force Initial Draft Recommendations*, released October 7, 2020

https://ww2.arb.ca.gov/sites/default/files/2020-10/offsets_task_force_draft_report_100720.pdf

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November 6, 2020

We would like to thank the California Air Resources Board for the opportunity to provide comment on the *Compliance Offsets Protocol Task Force Initial Draft Recommendations*. ACR commends the Offset Task Force on their thorough and thoughtful work to prepare the Initial Draft Recommendations.

We support the conclusions and recommendations of the sub-groups in the areas of Blue Carbon and Wetlands, Forestry, ODS/High GWP Substance Destruction and Mine Methane Capture.

We support the conclusions and recommendations of the Livestock, Agriculture and Rangeland recommendations sub-group but emphasize one point regarding potential. Based on ACR's analysis of land conversion to agriculture in all U.S. counties over the last several decades, less than 20 counties in California were identified as experiencing relatively high rates of conversion relative to the rest of the nation (Appendix B, ACR Avoided Conversion of Grasslands Methodology). Many of these counties produce specialty crops of high economic value, and while rates of conversion (relative to what is available) may be high in the recent past the absolute number of acres likely to be placed under easement may be lower than in other parts of the U.S. The economic proposition to individual landowners of placing viable cropland under easement in California agricultural areas should be examined closely during methodology development to truly understand the ERT potential, as it may be considerably lower than the physical potential. The sub-group points out the up-front costs of land conservation easements inherent to this project type (\$70,000 - \$150,000). These are often covered by grant programs that are oversubscribed. Identification of a reliable funding source for easements is needed for ERT projections.